

KOBRE & KIM LLP

800 THIRD AVENUE
NEW YORK, NEW YORK 10022
WWW.KOBREKIM.COM

TEL +1 212 488 1200
FAX +1 212 488 1220

NEW YORK
LONDON
HONG KONG
WASHINGTON DC
MIAMI

June 5, 2012

VIA ELECTRONIC FILING

Honorable Joan M. Azrack
United States Magistrate Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Jean-Pierre Neuhaus and Roland Kaufmann
12-MJ- 00237

Dear Magistrate Judge Azrack:

We represent defendant Roland Kaufmann in connection with the above-captioned matter. Mr. Kaufmann was released on bail on March 27, 2012, following satisfaction of the conditions set by Magistrate Judge Steven M. Gold's Order Setting Conditions of Release and Bond, dated March 14, 2012. As a condition of his bail, Mr. Kaufmann is subject to home detention with electronic monitoring.

On May 11, 2012, Magistrate Judge Louis Bloom modified Mr. Kaufmann's bail conditions to permit Mr. Kaufmann to leave his apartment three times per week for one hour so that he can use the gym facilities located in the basement of his apartment building in order to exercise for health-related reasons. On May 25, 2012, Mr. Kaufmann's physician prescribed that Mr. Kaufmann, who is 59 years old, perform aerobic exercise for at least one hour every day of the week in order to reduce hypertension and excess cholesterol, and to lower his body weight. (The physician also prescribed medications to treat Mr. Kaufmann's high blood pressure and other conditions.) Accordingly, Mr. Kaufmann respectfully requests that his bail conditions be further modified to permit him to leave his apartment for one hour every day of the week, as determined by Pretrial Services, so that he can get his daily exercise as prescribed by his physician. At no time does Mr. Kaufmann leave his apartment building when going to and from the gym facilities.

Hon. Joan M. Azrack

June 5, 2012

Page 2

We have consulted with the Government and with Pretrial Services, and both have informed us that they have no objection to Mr. Kaufmann's request.

We thank Your Honor for your consideration of this matter.

Respectfully submitted,

/s/ Eric J. Snyder

Eric J. Snyder

/s/ Josef M. Klazen

Josef M. Klazen

cc: N. Nathan Dimock, U.S. Department of Justice (via e-mail)
Justin Goodyear, U.S. Department of Justice (via e-mail)
Shannon Jones, Assistant United States Attorney (via-e-mail)
Anna Lee, U.S. Pretrial Services (via-e-mail)